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Attorney for Jeri Coppa-Knudson, Trustee

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

IN RE: CASE NO. BK-N-14-50333-BTB
ANTHONY THOMAS and CASE NO. BK-N-14-50331-BTB
WENDI THOMAS, (Jointly Administered)
AT EMERALD, LLC, CHAPTER 7
Debtors.

JERI COPPA-KNUDSON, TRUSTEE, ADV. PROC. NO. 17-05005-BTB
Plaintiff,

vs.

KENNETH CONETTO, ESTATE OF
ERIC KITCHEN, KIMBERLY KLOTZ,
WAYNE CATLETT and SHERIFF OF
SANTA CLARA COUNTY,

Defendants.

**NOTICE OF HEARING ON MOTION FOR
ENTRY OF DEFAULT JUDGMENT
PURSUANT TO F.R.CIV.P. 55 AND
F.R.BANKR.P. 7055**

Hearing Date: September 19, 2018
Hearing Time: 10:00 a.m.

NOTICE IS HEREBY GIVEN that a paper entitled Motion For Entry Of Default Judgment Pursuant to F.R.Civ.P. 55 and F.R.Bankr.P. 7055 ("Default Judgment Motion") has been filed by Jeri Coppa-Knudson, chapter 7 trustee ("Trustee"). In the Default Judgment Motion, the Trustee requests the Court enter a judgment against Defendants Estate of Eric Kitchen, Kimberly Klotz and Wayne Catlett pursuant to F.R.Civ.P. 55 and F.R.Bankr.P. 7055, declaring Trustee, as the Trustee for the Thomas and AT Emerald chapter 7 cases, the sole owner of the Santa Clara Emerald currently in the custody of the Sheriff of Santa Clara County, California. Entry of the judgment will allow the Santa Clara

1 County Sheriff to deliver the Santa Clara Emerald to Trustee, so that this estate asset may be
2 administered.

3 **NOTICE IS FURTHER GIVEN** that a hearing on the Default Judgment Motion
4 has been scheduled before a United States Bankruptcy Judge, in the Clifton Young Federal
5 Building, 300 Booth Street, Reno, Nevada on **September 19, 2018 at 10:00 a.m.**

6 **NOTICE IS FURTHER GIVEN** that any opposition must be filed pursuant to the
7 time limits set forth in Local Rule 9014 for oppositions to a motion. Local Rule 9014(d)
8 provides as follows:

9 [A]ny opposition to a motion must be filed with the Clerk of the court, and
10 service of the opposition must be completed on the movant, no later than
11 fourteen (14) days preceding the hearing date for the motion. The opposition
12 must set forth all relevant facts and any relevant legal authority. An
opposition must be supported by affidavits or declarations that conform to the
provisions of subsection (c) of this rule.

13 If you do object to the relief requested, you must file a **WRITTEN** response with the court.
14 You *must* also serve your written response on the person who sent you this notice. A paper
15 copy of any response should also be delivered to the Clerk's office identified as "Copy For
16 Chambers" or some similar designation. If you do not file a written response with the court,
17 or if you do not serve your written response on the person who sent you this notice, then:

- 18 • The court may *refuse to allow you to speak* at the scheduled hearing; and
- 19 • The court may *rule against you* without formally calling the matter at the
20 hearing.

21 **NOTICE IS FINALLY GIVEN** that a copy of the Default Judgment Motion can be
22 obtained upon request from Hartman & Hartman, 510 West Plumb Lane, Suite B, Reno,
23 Nevada 89509, by calling Hartman & Hartman at 1-775-324-2800.

24 DATED: August 9, 2018.

25 **HARTMAN & HARTMAN**

26 /S/ Jeffrey L. Hartman
27 Jeffrey L. Hartman, Esq.
28 Attorney for Jeri Coppa-Knudson, Trustee

CERTIFICATE OF SERVICE

I certify that I am an employee of Hartman & Hartman, and that on this date I caused to be served by U.S. Mail, postage prepaid, a copy of the within document upon:

Wayne Catlett
PO Box 5692
Santa Barbara, CA 93150-0647

Further, I emailed a copy of this document to Anthony Thomas at his requested email address, ATEmerald@gmail.com.

DATED: August 9, 2018.

/S/ Stephanie Ittner
Stephanie Ittner